# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) JOAN HALL,	)
Plaintiff,	)
v.	) No. 12-CV-1193-0
(1) WESTERN UNITED INSURANCE	)
COMPANY, d/b/a AAA INSURANCE COMPANY,	)
Defendant.	)

### **DEFENDANT'S FINAL WITNESS LIST**

Pursuant to the Court's Scheduling Order, the following is Defendant's Final Witness

#### List:

No.	Name and Address	Proposed Testimony
1.	Donald Hall c/o Mansell Engel & Cole 101 Park Avenue, Suite 665 Oklahoma City, OK 73102	Knowledge of loss and damages, purchase of insurance policy, denial of claim and damages, investigation and handling of claim, scope, amount and cause of damages, insurance coverage
2.	Joan Hall c/o Mansel Engel & Cole 101 Park Avenue, Suite 665 Oklahoma City, OK 73102	Knowledge of loss and damages, purchase of insurance policy, denial of claim and damages, investigation and handling of claim, scope, amount and cause of damages, insurance coverage
3.	Lyle Nickel, Agent AAA Insurance 215 W. Owen Garriott, Suite 1B Enid, OK 73701	Purchase of policy of insurance, investigation and denial of claim and damages.

4.	Matthew McKenna, Casualty Specialist AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy.
5.	Jennifer Lee, Casualty Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy.
6.	Jennifer Lobdell, Claims Representative Jonathan, Neal & Associates, Inc., c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
7.	Ed Timmons, Representative of Jonathan, Neal & Associates, Inc. c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Jonathan, Neal & Associates policies and procedures for asserting subrogation claims on behalf of AAA Insurance
8.	Liz Dizer, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
9.	Wendy L. Miller, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
10.	Ian Hedrick, Claims Service Adjuster AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
11.	Lisa Jaynes, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy

12.	Tim Edwards, Total Loss Specialist AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
13.	Kyle Chasey, GEICO Claims Adjuster 930 N. Finor-Center Drive Tucson, AZ 85710	Handling of Plaintiff's claim against insured and payments
14.	Jessica Daily, GEICO Claims Adjuster 930 N. Finor-Center Drive Tucson, AZ 85710	Handling of Plaintiff's claim against insured and payments
15.	Rhonda Davis, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
16.	Saida Lopez, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
17.	Dena Reed, Subro Specialist AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
18.	Cresta Derry, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
19.	Dawn Harrison, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy

20.	Jonathan Neil, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
21.	Anna Maria Thiel, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim.  Defendant's claims procedures and practices in regard to subrogation
22.	Nora Brody, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
23.	Stephen Perrando, Claims Representative AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Handling of Plaintiff's claim; Defendant's claim procedures and practices; coverages afforded by policy
24.	Art Bates A.T. Bates Insurance Consulting, LLC 1325 Smiling Hill Blvd. Edmond, OK	Will testify on insurance industry claim practices, Defendant's claim practices, and facts and circumstances of handling of this claim
25.	Dovie Lowery AAA Insurance c/o Gregory D. Nellis 525 S. Main, Suite 1500 Tulsa, OK 74103	Defendant's claims procedures and practices in regard to subrogation
26.	Paul S. Martin, Attorney 116 North Fifth Street Ponca City, Oklahoma 74602	His representation of Joan and Donald Hall including contact with this Defendant and GEICO
27.	Defendant reserves the right to call Plaintiff's witnesses	
28.	Defendant reserves the right to list additional witnesses as discovery continues.	
29.	Plaintiff's witnesses not objected to by Plaintiff	

Respectfully submitted,

## ATKINSON, HASKINS, NELLIS, BRITTINGHAM, GLADD & FIASCO

A PROFESSIONAL CORPORATION

/s/ Gregory D. Nellis

Gregory D. Nellis, OBA #6609 J. Andrew Brown, OBA #22504 1500 ParkCentre 525 South Main Tulsa, OK 74103-4524

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of September 2013, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for fling and transmittal of a Notice of Electronic Filing to the following:

Steven S. Mansell Mark A. Engel Kenneth G. Cole Mansell, Engel & Cole 101 Park Avenue, Suite 665 Oklahoma City, OK 73102

/s/ Gregory D. Nellis

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